

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

Plaintiff;

v.

COMMONWEALTH OF PUERTO RICO,
ET AL.,

Defendants.

No. 12-cv-2039 (GAG/PG)

**RESPONSE TO MOTION FOR EXTENSION OF TIME TO
SUBMIT THE STAFFING PLAN**

COMES NOW, Plaintiff, the United States of America, in response to the Motion for an Extension of Time, ECF No. 899 (June 28, 2018), filed by Defendants Commonwealth of Puerto Rico, et al. (“Defendants”), and pursuant to this Court’s Order, ECF No. 900 (June 29, 2018), and states and prays as follows:

1. Defendant Puerto Rico Police Bureau (“PRPB”) agreed to conduct a staffing and resource allocation study, and to complete a staffing plan based on the study. *See* Agreement for the Sustainable Reform of the Puerto Rico Police Department ¶ 13, ECF No. 60 (July 17, 2013); Action Plans, at 24-25, ECF No. 550-1 (June 22, 2017).

2. On March 9, 2018, the Parties agreed to extend the deadline for the completion of the staffing and resource allocation study to April 30, 2018, and the deadline for the completion of the plan to June 30, 2018. Supp. Joint Mot., at 8, ECF No. 775 (Mar. 9, 2018).

3. Defendants now seek an extension of time until August 27, 2018 for the PRPB to complete and submit to this Court its staffing and resource allocation plan. *See* Mot. for an Extension of Time, ‘Wherefore’ clause, ECF No. 899.

4. Given the scope and complexity of the findings and recommendations in the Commonwealth's staffing study, the Commonwealth will need to devote significant time and resources to develop an adequate staffing plan, pursuant to Agreement paragraph 13. The planning process will also require considerable coordination among PRPB units and collaboration with external agencies. Accordingly, the United States does not object to the Commonwealth's request, pursuant to Paragraph 239.

Respectfully submitted, this 6th day of July, 2018,

STEVEN H. ROSENBAUM
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 6th day of July, 2018, I filed the foregoing pleading electronically through the CM/ECF system, which caused the parties, counsel of record and the Technical Compliance Advisor on the service list to be served by electronic means.

S/BRIAN BUEHLER
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